

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

VINCENT PALMIERI,

Plaintiff,

- against -

EAST COAST POWER & GAS, LLC; and DOES
1 through 10,

Defendants.

Case No.: 1:20-cv-02663-RA

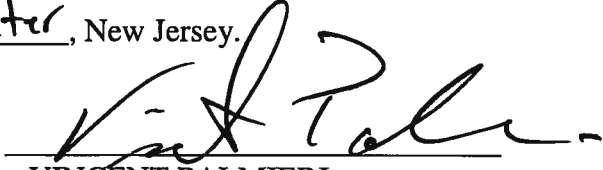
**PLAINTIFF VINCENT
PALMIERI'S DECLARATION
IN OPPOSITION TO MOTION
TO DISMISS**

I, Vincent Palmieri, declare under penalty of perjury, as follows:

1. I am the plaintiff in this action. I submit this Declaration in support of my Opposition to Defendants' Motion to Dismiss.
2. I am familiar with all of the facts and circumstances in this action described herein and, if called upon to testify thereon, I would and could testify competently thereto.
3. I have worked exclusively in the energy trading and retail energy services fields since 1996.
4. I worked as the Chief Operating Officer and then the Chief Executive Officer of East Coast Power & Gas, LLC from February 2014 until I was terminated in February 2020.
5. I am currently unemployed. I have been seeking employment in the energy trading and retail energy services fields, and I intend to accept employment in those fields as I have worked exclusively in those fields for the past 24 years.
6. Defendants East Coast Power & Gas, LLC, John Knief and Anthony Milanese have not indicated to me that they do not intend to enforce the covenants not to compete with their business or solicit customers from their business.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 29h day of May, 2020 at Edgewater, New Jersey.



VINCENT PALMIERI